

MEMORANDUM

December 7, 1995

To: Robert Caudle
Linda Cipriani

From: David Marwell

Subject: Anne Goodpasture Deposition

This memorandum confirms today's discussion with John Pereira regarding the arrangements that we have made in preparation for the Goodpasture deposition. The deposition will take place in Dallas, Texas on December 15 at the U.S. Attorneys office. Jeremy Gunn will take the deposition, with the assistance of Michelle Seguin. We have secured a court reporter from the firm of Dickman, Davenport, & Langford located in Dallas and have confirmed the court reporter's clearance level of Secret with the Department of Justice. For your convenience, we have attached a copy of the clearance certification. As discussed today, we believe that this level of clearance will be sufficient for this particular deposition. We also have taken all necessary security precautions for transport of the classified material. If you have any questions, please feel free to contact us.